

December 19, 2018

**SUBMITTED ELECTRONICALLY VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Supplement to Chicago Public Schools Request for Waiver  
Schools and Libraries Universal Service Support Mechanism,  
Docket No. 02-6

Dear Ms. Dortch:

On November 19, 2018, the Chicago Public Schools (CPS) filed a request for waiver of section 54.507 of the Commission's rules.<sup>1</sup> In the CPS Waiver Request, CPS explained that the E-rate manager for the CPS had timely filed the extension request in July 2018—two months before the due date. It appears that the request was not recorded in the E-rate Productivity Center, however, and so CPS submitted a request for waiver so that USAC can accept the submission that was refiled nine days after the deadline.

Because CPS expected to receive a denial based on the fact that USAC thought the extension request was filed late, it focused its discussion in the waiver request on the procedural issue, and not on the merits of its extension request. CPS now submits this supplement to its waiver request to address the substance of its extension request.

Section 54.507(d)(4)(iii) of the Commission's rules provides that an applicant may obtain an implementation extension from USAC if "[t]he applicant's service provider is unable to complete implementation for reasons beyond the service provider's control" or "if the applicant's service provider is unwilling to complete installation because funding disbursements are delayed while the Administrator investigates the application for program compliance."<sup>2</sup> Both of these criteria are true for this CPS application.

Delay in the installation of these services was beyond the control of CPS's service provider,

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<sup>1</sup> Request for Waiver of Section 54.507 of the Commission's Rules by the Chicago Public Schools, Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, dated Nov. 19, 2018 (CPS Waiver Request).

<sup>2</sup> 47 C.F.R. § 54.507(d)(4)(iii), (iv).

Sentinel Technologies (Sentinel). Sentinel has a vendor pool of 12 qualified construction vendors authorized to do business with CPS. Sentinel must choose one of those vendors to work with to complete the equipment installation. Usually only two to four of these vendors respond to an RFP. If only one vendor submits a bid, Sentinel must conduct a second competitive bidding process, according to CPS procedures. This has resulted in a delay of the equipment installation for FY 2017.

In addition, CPS needed the extension because some of the equipment requested on its application was no longer available for purchase (specifically the 2802 access points). CPS was planning to file a service substitution request to update the application once the extension was granted. The fact that the equipment was no longer available resulted in some of the time that was requested in the extension, as the District could not install the obsolete equipment and had to identify replacement equipment.

Further, USAC “holds” on CPS funding in the past two years have resulted in the stoppage of installation as Sentinel did not want to continue work while USAC was reviewing applications and was not releasing disbursements for CPS applications. For example, in funding year 2016, USAC audited CPS. During that nine-month period, USAC did not release any invoice payments to Sentinel Technologies. That pushed back some of the FY 2016 work into FY 2017. Further, USAC did not pay Sentinel for five months in 2017 and 2018. During those times, work was put on hold pending the resumption of payments for the CPS work. Those delays have interrupted and pushed back the installation of equipment in FY 2017.

CPS fully expects that the remaining work will be able to be completed in a few months, if the service extension is granted. Importantly, granting this appeal would simply allow eligible schools to receive funding for eligible services. As such, CPS respectfully requests that the Bureau grants its request for waiver.

Please let us know if you have any further questions.

Respectfully submitted,



Sharon Wong  
E-Rate Manager  
Information & Technology Services  
Chicago Public Schools

cc: James Bachtell (via email)